

# **EXHIBIT 1**

2120 - Served  
 2220 - Not Served  
 2320 - Served By Mail  
 2420 - Served By Publication  
**SUMMONS**

2121 - Served  
 2221 - Not Served  
 2321 - Served By Mail  
 2421 - Served By Publication  
**ALIAS - SUMMONS**

**RECEIVED**  
 SEP 13 2016  
**ROOFERS UNION WELFARE FUND,**  
**PENSION FUND**

(2/28/11) CCG N001

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS,  
 COUNTY DEPARTMENT, CHANCERY DIVISION

2016CH10587  
 CALENDAR/ROOM 12  
 No. \_\_\_\_\_ TIME 00:00  
 Pet Accounting

PLEASE SERVE: Local #11 United Union  
 of Roofers, Waterproofers and Allied Workers,  
 9838 W. Roosevelt Rd., Westchester, IL 60154

ALESHIA REYES,  
 (Name all parties)  
 v.  
 LOCAL #11 UNITED UNION OF ROOFERS, WATERPROOFERS AND ALLIED WORKERS,

SUMMONS  ALIAS SUMMONS

To each Defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, and pay the required fee, in the Office of the Clerk of this Court at the following location:

- |                                                                                                                       |                                                                                                |                                                                                                |
|-----------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|
| <input checked="" type="radio"/> Richard J. Daley Center, 50 W. Washington, Room <u>802</u> , Chicago, Illinois 60602 | <input type="radio"/> District 3 - Rolling Meadows<br>2121 Euclid<br>Rolling Meadows, IL 60008 | <input type="radio"/> District 4 - Maywood<br>1500 Maybrook Ave.<br>Maywood, IL 60153          |
| <input type="radio"/> District 2 - Skokie<br>5600 Old Orchard Rd.<br>Skokie, IL 60077                                 | <input type="radio"/> District 6 - Markham<br>16501 S. Kedzie Pkwy.<br>Markham, IL 60428       | <input type="radio"/> Child Support<br>28 North Clark St., Room 200<br>Chicago, Illinois 60602 |
| <input type="radio"/> District 5 - Bridgeview<br>10220 S. 76th Ave.<br>Bridgeview, IL 60455                           |                                                                                                |                                                                                                |

You must file within 30 days after service of this Summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF REQUESTED IN THE COMPLAINT.

To the officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than 30 days after its date.

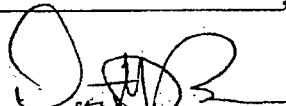
Atty. No.: 40171

WITNESS, \_\_\_\_\_

Name: DEUTSCHMAN & ASSOCIATES, P.C.

Atty. for: Plaintiff

Address: 77 West Washington St., Ste 1525



City/State/Zip: Chicago, IL 60602

Telephone: 312-419-1600

Clerk of Court  
**DOROTHY BROWN AUG 11 2016**

Date of service: \_\_\_\_\_  
 (To be inserted by officer on copy left with defendant  
 or other person)

Service by Facsimile Transmission will be accepted at: \_\_\_\_\_

(Area Code) (Facsimile Telephone Number)

**DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS**

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION

ALESHIA REYES, )  
Plaintiff, )  
v. ) No. 2016CH10587  
LOCAL #11 UNITED UNION OF ROOFERS, ) CALENDAR/ROOM 12  
WATERPROOFERS AND ALLIED WORKERS, ) TIME 00:00  
Defendants. ) Pet Accounting

COMPLAINT AT LAW

NOW COMES the plaintiff, ALESHIA REYES, and complaining of the defendants, LOCAL #11 UNITED UNION OF ROOFERS, WATERPROOFERS AND ALLIED WORKERS, states as follows:

ACTION FOR ACCOUNTING

1. At all times relevant hereto, Plaintiff, ALESHIA REYES, was an individual residing in the Village of Godley and State of Illinois.
2. At all times relevant hereto, Defendant LOCAL #11 UNITED UNION OF ROOFERS, WATERPROOFERS AND ALLIED WORKERS (hereinafter "LOCAL 11"), was a labor union based in Cook County, Illinois, that performed various functions on behalf of its members, including the maintenance and administration of life insurance policies.
3. Plaintiff is the daughter of LARRY DODD, who passed away on February 25, 2016.
4. During his lifetime, LARRY DODD was a union hot roofer for LOCAL 11.

5. As a part of his membership with Defendant, LARRY DODD had a life insurance policy.

6. Upon information and belief, Plaintiff and her sister, JORDAN DODD, were beneficiaries of the life insurance policy.

7. After LARRY DODD's death, a claim was made on the life insurance policy in question.

8. Upon information and belief, some amount of benefits was paid to Plaintiff's aunt, ROBIN SMITH.

9. Upon information and belief, the amount paid to ROBIN SMITH was improper in whole or in part.

10. Plaintiff has unsuccessfully sought to obtain more information about the details of the policy, the related benefit payouts, and why the payouts were made as they were.

11. In Plaintiff's current position, she lacks an adequate remedy at law.

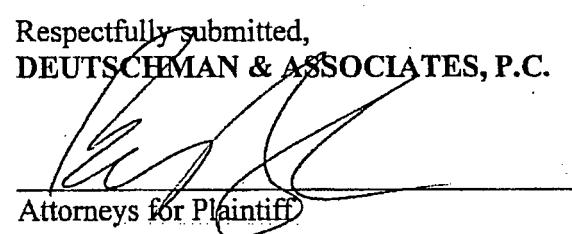
12. Plaintiff has a need for discovery to find out the true nature of the policy and its beneficiaries, the amounts paid out to any party as a result of LARRY DODD's death, and the actions of ROBIN SMITH and others leading to said payouts.

WHEREFORE, Plaintiff prays that this honorable Court enter judgment in favor of Plaintiff ALESHIA REYES and against Defendant, LOCAL #11 UNITED UNION OF ROOFERS, WATERPROOFERS AND ALLIED WORKERS, as follows:

A. For an accounting between Plaintiff and Defendants (including but not limited to the details of the life insurance policy of Larry Dodd, any benefit payments made pursuant to the policy, and why said payments were made);

- B. For any amount(s) found to be due from Defendants to Plaintiff as a result of the accounting, and interest on said amount(s); and
- C. For such other and further relief as the court may deem proper.

Respectfully submitted,  
**DEUTSCHMAN & ASSOCIATES, P.C.**



\_\_\_\_\_  
Attorneys for Plaintiff

Jeffrey S. Deutschman  
Bradley A. Skafish  
**DEUTSCHMAN & ASSOCIATES, P.C.**  
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Chicago, IL 60602  
(312) 419-1600  
Attorney No. 40171